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September 7, 2022

By ECF Only

Honorable Katharine H. Parker, U.S.M.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 17D
New York, New York 100007

Re: *Graham Chase Robinson v. Canal Productions, Inc. et al.*
Civil Action No. 1:19-cv-9156 (LTS) (KHP)

Dear Judge Parker:

As you know, we represent Canal Productions, Inc. together with Traub Lieberman, who is also counsel to Mr. De Niro.

We write with the consent of Plaintiff's counsel to request leave to conclude Mr. De Niro's deposition on Friday, October 14, 2022. The Court previously set September 16 as the cutoff date for all discovery. No other modifications to the discovery cutoff date are requested.

The reasons this modification is sought involve matters in Mr. De Niro's personal life relating to his obligations to his minor child and change of residence, and professional obligations relating to a movie being filmed in New York. We will provide the Court with greater detail if so directed.

We have explained the situation to Plaintiff's counsel who, as noted above, do not object.

We thank the Court for its consideration of this matter.

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

s/Laurent S. Drogin

By: _____
Laurent S. Drogin

cc: All counsel of Record (via ECF)